Remarks

Claims 1, 4, 7-8, 10-14, 19, 25-30, and 35-38 remain in this application.

Claim Rejections -- 35 USC 103

Claims 1, 19, and 35-36 were rejected under 35 U.S.C. 103 as allegedly being unpatentable over Morley et al. in view of Yoshiura et al and further in view of Redmond (US 7,301,944). Applicants respectfully traverse these rejections in relation to the claims as now amended.

Claim 1 as previously presented recites as follows:

1.   A method of securely displaying visual data comprising the steps of:
generating a private key and a corresponding public key within a display apparatus;
securely storing the private key within the display apparatus such that the private key is inaccessible from outside the display apparatus;
communicating the public key from the display apparatus to an encryption apparatus;
encrypting the visual data at the encryption apparatus using the public key, whereby encrypted visual data is formed;
transporting the encrypted visual data from the encryption apparatus to the display apparatus;
decrypting the encrypted visual data within the display apparatus such that an electronic version of the visual data is maintained within integrated circuits that are substantially inaccessible, wherein the integrated circuits comprise a decryption integrated circuit and a display integrated circuit, and further wherein, **in order to pass the visual data from the decryption integrated circuit to the display integrated circuit, the decryption integrated circuit encodes the visual data and the display integrated circuit decodes the visual data**; and
displaying the visual data as a visual image.

(Emphasis added.)

As shown above, the method of claim 1 recites "decrypting the encrypted visual data within the display apparatus such that an electronic version of the visual data is maintained within integrated circuits that are substantially inaccessible, wherein the integrated circuits comprise a decryption integrated circuit and a display integrated circuit, and further wherein, **in order to pass the visual data from the decryption**

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integrated circuit to the display integrated circuit, the decryption integrated circuit encodes the visual data and the display integrated circuit decodes the visual data." (Emphasis added.)

These limitations are discussed, for example, at page 4, line 31 through page 5, line 6, of the present application, which is reproduced below for convenience of reference.

> In order to pass the visual data from the decryption integrated circuit 38 to the display integrated circuit 40, the decryption integrated circuit 38 encodes the visual data forming encoded visual data. The decryption integrated circuit transfers the encoded visual data to the driver circuit 42 of the display integrated circuit 40. The driver circuit 42 decodes the encoded visual data within the display integrated circuit 40. The encoded visual data is encrypted such that the visual data is not available as in-the-clear data within the display apparatus 26. Thus, a zealous technician will be unable to easily access an electronic form of the visual data within the display apparatus.

(Emphasis added.)

Applicants respectfully submit that the aforementioned claim limitations are <u>not</u> disclosed or taught by the combination of Morley, Yoshiura, and Redmond. In particular, claim 1 recites that **"in order to pass the visual data from the decryption integrated circuit to the display integrated circuit, the decryption integrated circuit encodes the visual data and the display integrated circuit decodes the visual data."** Advantageously, this avoids the visual data being available as "in-the-clear" data within the display apparatus and prevents a "zealous technician" from being able to easily access an electronic form of the visual data within the display apparatus.

The latest office action states that "Morley does not specifically disclose the decryption integrated circuit encodes the visual data and the display integrated circuit decodes the visual data." Applicants agree that Morley does not disclose the above-discussed claim limitation. Yoshiura is cited in relation to public and private keys and also does not disclose the above-discussed claim limitation.

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The latest office action cites to Redmond as allegedly teaching the above-discussed claim limitation. Applicants respectfully disagree with this allegation.

Applicants respectfully submit that such encoding and decoding of the visual data as it is passed **between integrated circuits** in the display apparatus is <u>not</u> taught or suggested in Redmond.

In particular, the latest office action cites to column 10, lines 9-20 of Redmond and states that the "copy protection generator is part of decryption integrated circuit." For convenience of reference, column 10, lines 9-20 and Figure 5 of Redmond are reproduced below.

Preferably, copy protection generator 76 is a digital signal processing that encodes the media file with analog copy protection. Analog copy protection includes coding that is generated within the data file that inhibits the file from being transferred to another medium, for example, video cassette, by ensuring that any such copy is significantly degraded in quality. Copy protection hardware, such as provided by Macrovision®, include appropriate coding for a given media file type to be displayed in a preselected format (e.g., VGA, HDTV format, NTSC format, etc.).
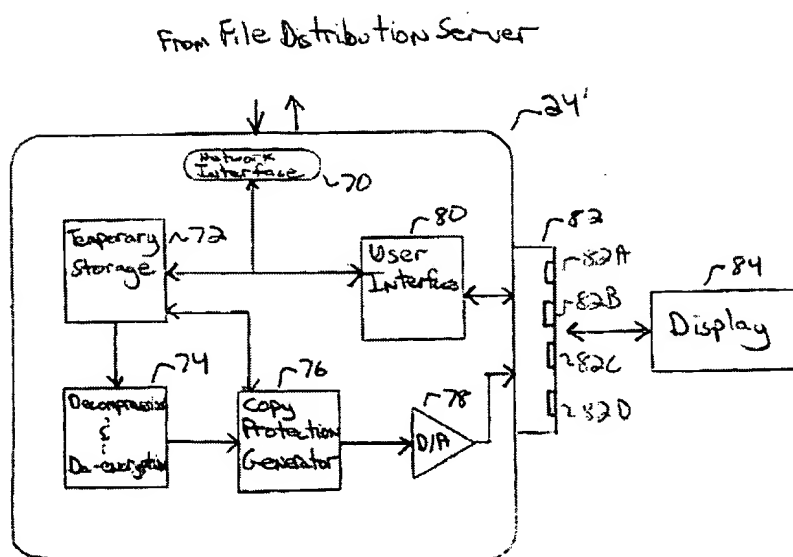
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From File Distribution Server

Figure 5

As shown in Figure 5 of Redmond, the cited **copy protection generator 76 is on user system 24' (for example, a "set-top" system)**. The copy protection generator is **not within an integrated circuit in the display apparatus**. Hence, the action performed by the copy protection generator 76 cannot read on the claimed encoding by the decryption integrated circuit in the display apparatus.

Furthermore, the decompression and de-encryption block 74 of Redmond **outputs a decompressed and decrypted (i.e. an unprotected) media file** to the copy protection generator 76. "Once the media file is decompressed and/or de-encrypted, the file is sent to a copy protection generator 76." As such, between the decompression and de-encryption block 74 and the copy protection generator 76, the media file in Redmond is **vulnerable to digital piracy**. In other words, Redmond has the visual data available as "in-the-clear" data between the de-encryption block 74 and the copy protection generator 76 such that a "zealous technician" may access an electronic form of the visual data.

Therefore, applicants respectfully submit that the citation to Redmond does <u>not</u> teach the limitation that such that "**in order to pass the visual data from the**

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**decryption integrated circuit to the display integrated circuit, the decryption
integrated circuit encodes the visual data and the display integrated circuit
decodes the visual data."**

Therefore, for at least the above-discussed reasons, applicants respectfully
submit that claim 1, as previously presented, overcomes its rejection.

Claim 19 recites "that the visual data is encoded before being passed between
the integrated circuits" within the display apparatus. Therefore, for reasons discussed
above in relation to claim 1, applicants respectfully submit that claim 19 also overcomes
its rejection.

Claims 20-30 depend from claim 19. Hence, claims 20-30 also overcome their
rejections for at least the same reasons as discussed above for claim 19.

Claim 35 recites that "the visual data is encoded prior to passing between the
circuit elements of the display apparatus." Therefore, for reasons discussed above in
relation to claim 1, applicants respectfully submit that claim 35 also overcomes its
rejection.

Claim 36 depends from claim 35. Hence, claim 36 also overcomes its rejection
for at least the same reasons as discussed above for claim 35.

Claims 4, 7-8, 10-14, 25-30, and 37-38 were rejected under 35 U.S.C. 103 as
allegedly being unpatentable over Morley et al, Yoshiura, and Redmond, as applied to
claims 1, 19, 35 and 36, and further in view of Kowarz et al. Applicants respectfully
traverse these rejections.

Claims 4, 7-8, 10-14 depend from claim 1. Applicants respectfully submit that the
recitation in claim 1 of encoding and decoding in order to pass the visual data between
integrated circuits in the display apparatus is not taught in the cited references. Hence,
for the reasons discussed above in relation to claim 1, claims 4, 7-8, 10-14 are also
patentably distinguished over the cited references.

In addition, for example, claim 4 recites various additional limitations relating to the displaying of the visual data. Applicants respectfully submit that these limitations further distinguish claim 4 over the cited references.

Claims 25-30 depend from claim 19. Applicants respectfully submit that the recitation in claim 19 of encoding the visual data before it is passed between integrated circuits in the display apparatus is not taught in the cited references. Hence, for the reasons discussed above in relation to claim 19, claims 25-30 are also patentably distinguished over the cited references.

Claim 37 depends from claim 35. Applicants respectfully submit that the recitation in claim 35 of encoding the visual data before it is passed between circuit elements of the display apparatus is not taught in the cited references. Hence, for the reasons discussed above in relation to claim 35, claim 37 is also patentably distinguished over the cited references.

Claim 38 recites that "the visual data is encoded prior to passing between the circuit elements of the display apparatus." Applicants respectfully submit that this limitation is not taught in the cited references. Therefore, for similar reasons discussed above in relation to claim 1, applicants respectfully submit that claim 38 also overcomes its rejection.
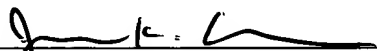
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Conclusion

For at least the above-discussed reasons, applicants believe that the pending claims, as hereby amended, are now patentably distinguished over the cited art and are now in suitable form for allowance. Favorable action is respectfully requested.

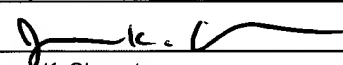The examiner is also invited to call the below-referenced attorney to discuss this case.

Respectfully Submitted,

Robert W. Corrigan et al.

Dated: February 26, 2008

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